

# **EXHIBIT M**

**In re MOTORS LIQUIDATION COMPANY, et al.,**  
**f/k/a General Motors Corp., et al., No. 09-50026**

**GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of**  
**Howard Steel and the Plaintiffs and Participating Unitholders' Objections Thereto**

<b>Howard Steel</b>		
<b>November 8, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
9:11	9:16	
9:22	9:24	
10:10	10:21	
14:11	14:15	
14:24	15:19	
16:12	16:20	
17:14	17:17	
17:19	18:12	
18:19	19:7	
22:4	22:10	
23:6	23:12	
24:24	24:25	
25:2	25:15	
27:1	27:22	
28:1	28:11	
37:7	37:12	
51:15	52:2	
52:14	52:25	
53:2	53:9	
55:3	55:22	
66:11	66:13	
67:17	68:15	
68:21	69:3	
69:18	69:19	Improper record objection (401-403)
70:5	70:13	Incomplete in and of itself (106); waste of time/ minimal probative value/ confusion of the issues
70:14	70:19	
82:22	83:4	
83:11	83:25	
87:2	87:11	
87:24	89:21	
91:4	91:11	
91:20	92:19	

Howard Steel November 8, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
104:17	104:25	
105:7	105:9	
105:21	107:1	106:16-107:1 (FRE 602, lack of personal knowledge)
108:6	108:19	108:6-12 (FRE 602, lack of personal knowledge)
108:22	109:4	
109:9	109:23	
114:5	115:7	
117:4	117:24	
118:17	119:17	
125:7	125:13	

**Plaintiffs and Participating Unitholders' Counter Designations of the Deposition Testimony of Howard Steel and the GUC Trust and New GM's Objections Thereto**

Howard Steel November 8, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
10:22	10:25	Prejudicial, Confusing, Misleading (FRE 403); Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805); Outside the Scope of FRCP 32(a)(6)
11:7	11:25	Prejudicial, Confusing, Misleading (FRE 403); Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805); Outside the Scope of FRCP 32(a)(6)
12:12	13:14	Prejudicial, Confusing, Misleading (FRE 403); Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805); Outside the Scope of FRCP 32(a)(6)

Howard Steel November 8, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
69:4	69:17	
81:2	82:6	Prejudicial, Confusing, Misleading (FRE 403); Hearsay (FRE 801/802/805)
82:9	82:13	Prejudicial, Confusing, Misleading (FRE 403); Hearsay (FRE 801/802/805)
82:19	82:21	Prejudicial, Confusing, Misleading (FRE 403); Hearsay (FRE 801/802/805)
115:22	117:3	Prejudicial, Confusing, Misleading (FRE 403); Relevance (FRE 401/402)
119:18	120:13	
123:16	125:6	Prejudicial, Confusing, Misleading (FRE 403)